

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

ANDRE BISASOR,
Plaintiff

Vs.

CASE NO.: 1:23-CV-00374-JL

CRAIG DONAIS, RUSSELL HILLIARD,
DONAIS LAW OFFICES PLLC,
UPTON AND HATFIELD LLP and
MARY K. DONAIS,
Defendants

**DEFENDANTS CRAIG S. DONAIS, MARY K. DONAIS AND DONAIS LAW OFFICES
PLLC’S MOTION FOR LEAVE TO EXCEED PAGE LIMIT ON THEIR OBJECTION TO
PLAINTIFF’S RE-SUBMITTED MOTION TO AMEND THE STATE COMPLAINT
WITH ATTACHED/ACCOMPANYING PROPOSED AMENDED COMPLAINT AND
REQUEST FOR HEARING (DOC. 159) AND PLAINTIFF’S CORRECTED RE-
SUBMITTED MOTION TO AMEND THE STATE COMPLAINT WITH
ATTACHED/ACCOMPANYING PROPOSED AMENDED COMPLAINT AND REQUEST
FOR HEARING (DOC. 161)**

Craig S. Donais, Mary K. Donais, and Donais Law Offices PLLC (the “Donais Defendants”), by their attorneys, hereby move this Honorable Court, pursuant to Local Rule 7.1(a)(3), for leave to file an Objection to Plaintiff’s Re-Submitted Motion to Amend the State Complaint with Attached/Accompanying Proposed Amended Complaint and Request for Hearing (Doc. 159) and Plaintiff’s Corrected Re-Submitted Motion to Amend the State Complaint with Attached/Accompanying Proposed Amended Complaint and Request for Hearing (Doc. 161) exceeding fifteen (15) pages. In support of this Motion, the Donais Defendants state the following:

1. On March 12, 2024, Plaintiff filed his Motion to Amend with his proposed Second Amended Complaint attached. (Doc. 159 and 159-1.) On March 13, 2024, Plaintiff filed his “Corrected” Motion to Amend with his corrected proposed Second Amended Complaint attached (“CPSAC”) (Doc. 161 and Doc. 161-1). The CPSAC brings 13 counts against 8 defendants. Plaintiff

seeks to add three defendants and one cause of action. Plaintiff's CPSAC asserts claims for defamation, libel, false light/invasion of privacy, civil rights violations, violations of M.G.L. ch. 93A, breach of fiduciary duty, breach of implied contract and breach of implied covenant of good faith and fair dealing and a violation of 42 U.S.C. §1981 against defendants Craig S. Donais and Donais Law Offices PLLC; a claim of aiding and abetting defamation against Mary Donais, Russell Hilliard and Upton & Hatfield; claims of tortious interference with advantageous relationship and intentional infliction of emotional distress against all Donais Defendants, Hilliard and Upton & Hatfield; a claim of civil conspiracy against Donais, Hilliard, Mary Donais and proposed new defendant Beatriz Van Meek; and a M.G.L. c. 176D claim against two John Doe Companies.

2. Plaintiff's CPSAC now totals 68 single-spaced pages and contains thirteen counts for relief pled in 718 paragraphs against eight defendants.

3. Due to the serious nature and numerous statements of purported fact that need to be addressed, the Donais Defendants request that they be allowed to exceed the 15-page limit of their objection to Plaintiff's Motions. The Donais Defendants anticipate that their objection will not exceed 25 pages.

4. Plaintiff has been contacted and he does not assent to this motion.

5. Counsel for co-defendants has been contacted and co-defendants assent to this motion.

WHEREFORE, Craig S. Donais, Mary K. Donais, and Donais Law Offices PLLC request that this Honorable Court:

A. Grant this Motion for Leave to Exceed Motion for Leave to Exceed Page Limit on their objection to Plaintiff's Motions to Amend (Docs. 159, 159-1, 161, 161-1); and

B. Grant such other and further relief as is reasonable just.

Respectfully submitted,

FOR THE DEFENDANTS,
CRAIG DONAIS, DONAIS LAW OFFICES
PLLC and MARY K. DONAIS

/s/ Linda M. Smith

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RULE 7.1(a)(2) CERTIFICATION

I hereby certify that I conferred with Plaintiff Andre Bisasor and attempted in good faith to resolve or narrow the issues addressed in this motion.

Date: March 25, 2024

/s/ Linda M. Smith

Linda M. Smith

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing **MOTION** to all parties in this action by serving same via electronic mail to:

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Date: March 25, 2024

/s/ Linda M. Smith

Linda M. Smith